

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 21-CR-30114-DWD
)	
SHOMANICKA N. HOLLY,)	
)	
Defendant.)	

STIPULATION OF FACTS

Comes now Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, through Luke J. Weissler, Assistant United States Attorney for this District, and herewith enter into the following Stipulation of Facts with the Defendant, Shomanicka N. Holly, represented by her attorney, Todd M. Schultz, pertaining to Holly's conduct charged in the Information in this case and her relevant conduct within the scope of U.S.S.G. § 1B1.3.

1. From at least August 11, 2016, and continuing until on or about June 27, 2019, Holly knowingly and willfully executed a scheme to defraud a health care benefit program, affecting interstate commerce as defined in Title 18, United States Code, Section 24(b), namely Medicaid, in connection with the delivery of and payment for health care benefits and services.

2. As part of her fraud scheme, Holly worked as a personal assistant for a qualified Medicaid beneficiary with the initials B.H., pursuant to the Home Services Program, a Medicaid Waiver Program designed to provide a personal assistant to a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home.

3. In order for Holly to receive payment from the State of Illinois for her personal assistant services, B.H. had to submit Home Services Program Time Sheets signed by both B.H. and Holly listing the hours worked by Holly as a personal assistant during a specified time period.

4. On May 10, 2016, Holly started working at Route 3 Liquors, in Sauget, Illinois, while also acting as B.H.'s personal assistant.

5. As part of her fraud scheme, Holly signed Home Services Program Time Sheets on which she falsely claimed hours of personal assistant services that were not actually performed on the dates and times as reported because Holly was actually working at Route 3 Liquors during those dates and times.

6. As charged in Count One of the Information, on June 27, 2019, in Saint Clair County, Illinois, Holly executed her scheme to defraud by knowingly submitting a Home Services Program Time Sheet requesting payment for personal assistant services not actually performed because she was working at Route 3 Liquors during reported times.

7. In addition, since at least 2014, Holly resided in East St. Louis, Illinois, and received housing assistance through a Public Housing program designed to provide decent and safe rental housing to eligible low-income families. The Public Housing program was funded by the United States Department of Housing and Urban Development (HUD) and managed by local housing agencies.

8. Each year, as part of the Public Housing program, Holly was required to complete an Application for Admission and Continued Occupancy, which required her to disclose the names of everyone living in her household and all sources of income that any members of the household received, such as wages and social security. The Application for Admission and Continued

Occupancy further required Holly to certify that the household composition and income information provided on the form were accurate and complete.

9. Based upon the information provided on the Application for Admission and Continued Occupancy, a local housing agency determined if the applicant remained eligible for assistance and the amount of assistance. Generally, if the applicant's household income increased and other variables remained the same, the applicant would receive less financial assistance.

10. As charged in Count Two of the Information, on or about January 17, 2019, in St. Clair County, within the Southern District of Illinois, Holly knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of HUD, in that she certified the household composition and income information that she provided on her Application for Admission and Continued Occupancy was accurate and complete to the best of her knowledge, when, in truth and in fact, and as Holly well knew, she failed to disclose that an individual with the initials B.H. resided in her household and earned social security income.


SO STIPULATED:

UNITED STATES OF AMERICA,

STEVEN D. WEINHOFER
United States Attorney



LUKE J. WEISSLER
Assistant United States Attorney


SHOMANICKA N. HOLLY
Defendant
TODD M. SCHULTZ
Attorney for Defendant

Date: 12-13-21

Date: 12/14/2021